



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

July 28, 2019

**REQUESTED TO BE FILED UNDER SEAL**

**VIA ECF**

The Honorable Alison J. Nathan  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: United States v. Steven Rawlins,  
15 Cr. 377/19 Cv. 0135 (AJN)**

Dear Judge Nathan:

The Government writes respectfully to request an adjournment until August 19, 2019 of its July 28, 2019 deadline to respond to the motion filed by defendant Steven Rawlins ("Rawlins") pursuant to Title 28, United States Code, Section 2255. On June 27, 2019, prior defense counsel Richard Braun, Esq., filed an affidavit in this matter addressing certain of the claims made in Rawlins's motion. In light of Rawlins's claims and some of the statements made by prior counsel in his affidavit, the Government needs to conduct further work to complete its response in a manner that will comprehensively address and analyze the relevant factual and legal issues for the Court. For example, the Government intends to speak with representatives of the victim companies, Prime Health Service, Inc. and Core Choice, Inc. Based on those discussions, it is possible that the Government will request and include one or more additional affidavits in its responsive filing. Because Rawlins's motion and Braun's affidavit raise numerous claims that require detailed analysis and review of the trial record and other documents, the Government respectfully requests until August 19, 2019 to file its response.

Thank you for your consideration of this request.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

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Cc: Steven Rawlins (via U.S. mail)  
Richard Braun, Esq. (via ECF)  
Steven Brill, Esq. (via ECF)